

Toxics Release Inventory

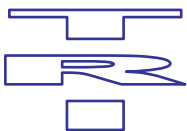
TRI Reporting Forms Modifications: Burden Reduction Rule

Shelley Fudge

TRI Program Division

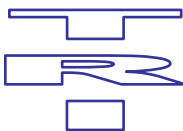
202-566-0674

Fudge.Shelley@epa.gov



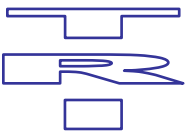
Reporting Forms Modifications Rule

- Primary goal: Proposing changes to Form R and Form A in order to streamline TRI reporting, wherever possible, to reduce burden on reporters (& EPA) while maintaining utility of the data
- Options derived from public comments and program considerations
- Timeline:
 - Proposed rule anticipated release: December 2004



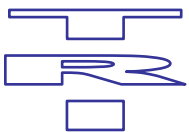
Four types of options

1. Facility information to remove from Form R and Form A, and instead, *obtain from EPA's on-line data systems*
2. Items to remove from Form R collection and TRI publications *entirely*
3. Sections to modify of Form R
4. Clarify Form A applicability



Facility information to remove from Part I of Form R and Form A, and *instead, obtain from Facility Registry System (FRS)*

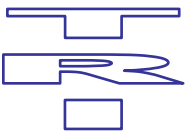
- Lat/long (Sec. 4.6)
- RCRA ID # (Sec. 4.8)
- NPDES permit # (Sec. 4.9)
- UIC well code # (Sec. 4.10)



In detail:

Remove Lat/long (Sec. 4.6)

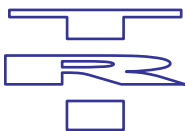
- ***Proposed Action:***
 - Remove Lat/Long data field from Form R, and instead pull Lat/Long data from EPA's Facility Registry System (FRS).
- ***Justification:***
 - Part of EPA's overall effort to centralize data collection and dissemination. FRS has been designated as EPA's authoritative, centralized source of Lat/Long data.



In detail:

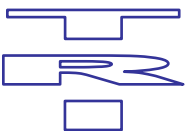
Remove RCRA, NPDES and UIC Program ID Numbers

- ***Proposed Action:***
 - Remove these data fields from Form R, and instead pull the data from EPA's Facility Registry System (FRS).
- ***Justification:***
 - Provide burden reduction and avoid duplication of effort.
 - FRS has been designated as EPA's authoritative, centralized source of such facility information.



Items to remove from Form R, Part II collection and TRI publications entirely

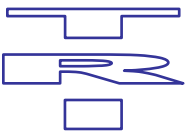
- Remove “% from Stormwater” (5.3C)
- Remove two columns from “On-site Waste Treatment Methods and Efficiency” (7A):
 - “Range of influent concentration” (7A.1c)
 - “Based on Operating Data?” (7A.1e)
- Remove optional additional information checkbox (Sec. 8.11)



In detail:

Remove “% From Stormwater” (5.3C)

- ***Proposed Action:***
 - Remove “% from Stormwater” for each “Stream or Water Body Name” under “Qty of the toxic chemical entering each environmental medium Onsite” (Sec. 5.3C)
- ***Justification:***
 - Reduce burden and simplify Sec. 5 of Form R.
 - Unnecessary to continue collecting this data since this section doesn’t appear to be widely used.



In detail:

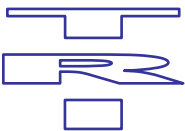
Remove 7A.1c and 7A.1e in “On-site Waste Treatment Methods and Efficiency”

- ***Proposed Action:***

- Remove “Range of influent concentration” (7A.1c), and “Based on operating data?” (7A.1e)

- ***Justification:***

- Reduce burden and simplify Sec. 7 of Form R.
- Unnecessary to continue collecting this data since these sections don’t appear to be widely used.



In detail:

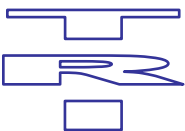
Remove optional additional information checkbox (Sec. 8.11)

- ***Proposed Action:***

- Remove Sec. 8.11 yes/no question: “Is additional info on source reduction, recycling, or pollution control activities included with this report?” from Form R.
- Continue to provide facilities the opportunity to submit this information and make it available through one of EPA’s on-line systems (e.g., e-DOCKET or Envirofacts)
- Include instructions on how to do this in reporting forms & instructions booklet.

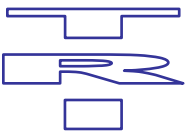
- ***Justification:***

- Streamline Form R—it is unnecessary to collect yes/no response.
- Increase public access to this additional information—thereby promoting source reduction activities of TRI facilities



Sections to modify of Form R

- Decrease number of codes in “On-Site Waste Treatment Method(s) Sequence” (7A.1b)
- Replace specific % amount with range codes in “Waste Treatment Efficiency Estimate” (7A.1d) with range codes
- Simplify “On-site Energy Recovery Processes” (7B) – use yes/no checkbox
- Decrease number of codes in “On-site Recycling Processes” (7C)



In detail:

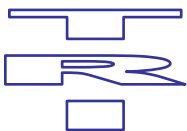
“On-site Waste Treatment Method(s) Sequence” (Sec. 7A.1b)

- ***Proposed Action:***

- Reduce existing 64 codes with 6 treatment “M” codes from Form R, Sec. 6.2.

- ***Justification:***

- While EPCRA requires the reporting of waste treatment or disposal methods used for each waste stream (7A.1b), EPA does not believe that this data is widely used.
- 7A.1b codes aren’t in TRI Explorer (in Envirofacts)
- Reduce burden, increase uniformity of codes



In detail:

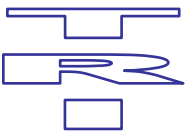
“Waste Treatment Efficiency Estimate” (Sec. 7A.1d)

- ***Proposed Action:***

- Allow facilities to report a range amount instead of the specific current percentage amount currently required.

- ***Justification:***

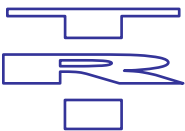
- While EPCRA requires the reporting of an estimate of the treatment efficiency achieved by the methods reported in 7A.1b, EPA this information doesn't appear to be widely used.
- Reduce burden, increase uniformity of codes.



In detail:

“On-site Energy Recovery Processes” (Sec. 7B)

- ***Proposed Action:***
 - Remove the three existing “U” codes; instead, provide “yes/no” checkbox for those who do on-site energy recovery.
- ***Justification:***
 - Reduce burden, simplify and increase uniformity of codes.



In detail:

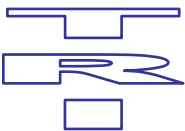
“On-site Recycling Processes” (Sec. 7C)

- ***Proposed Action:***

- Replace the 16 existing recycling codes with the four recycling “M” codes already used in Sec. 6.2.

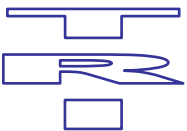
- ***Justification:***

- Reduce burden, simplify and increase uniformity of codes.



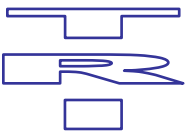
Clarify Form A applicability

- ***Proposed Action:***
 - Clarify EPA policy regarding use of Form A Certification Statement
- ***Justification:***
 - Address comments from facilities concerned about Form A eligibility



Next Steps

- The many options described here are still being fleshed out with other EPA offices.
- Our current burden savings analysis is thus based on the rule's overall cost and burden savings.
- Once we know which options will be included in the proposal, we can complete our burden savings analysis.



Burden Reduction Analytical Results

- Preliminary estimates for cost savings from the proposal are up to \$5.6 million.
- Preliminary estimates for total burden savings are up to 124,000 hours.

